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Peter Brostrom
Water Use and Efficiency Branch
Division of Statewide Integrated Water Management
California Department of Water Resources
P.O. Box 942836
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**Subject: Comments on the Independent Technical Panel's Public Draft
Report to the Legislature on Urban Water Management Plan
Demand Management Measure Reporting and Requirements**

Dear Mr. Brostrom:

The San Francisco Public Utilities Commission (SFPUC) is pleased to provide comments on the Independent Technical Panel's (ITP) Public Draft Report to the Legislature on Urban Water Management Plan (UWMP) Demand Management Measure Reporting and Requirements.

SFPUC recognizes the substantial effort and time commitment by the ITP and Department of Water Resources (DWR) staff in developing the Public Draft Report. We appreciate the ITP's willingness to listen to our concerns.

SFPUC supports the recommendation for energy intensity reporting to remain a voluntary, not mandatory, element of UWMPs. We do currently collect energy intensity data, and we have productive working relationships with the California Public Utilities Commission (CPUC) and local energy utilities. We support further focusing on productive and targeted partnerships, rather than overly burdensome reporting.

The ITP's report includes a recommendation that DWR would be the agency responsible for developing methodologies for estimating and reporting energy intensity. Since the ITP developed their recommendations, through the opening of a Rulemaking proceeding, the CPUC has been tasked with developing a partnership framework between investor-owned energy utilities and the water sector, along with methodologies to measure the embedded energy savings and cost-effectiveness of water/energy efficiency projects. In light of this new development, we recommend that DWR does not develop guidance in these areas, but rather allows the CPUC proceeding to develop the methodologies that DWR can insert into guidance at a future date. This would ensure that any information that water agencies voluntarily include in their UWMPs is consistent with the information needed by the CPUC.

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We also support the ITP's decision not to include the avoided cost proposal in the Draft Report recommendations. SFPUC is committed to conservation and diversification of our water supply portfolio to meet future demand. We consider a number of factors in long-term water supply planning, and avoided cost of water is only one aspect of a complex and multi-faceted decision when determining a supply portfolio. Some other factors we consider include reliability, cost effectiveness, environmental impacts, and water quality.

SFPUC looks forward to continuing to participate at a high level of engagement and coordination as the ITP process continues.

Please contact me at (415) 934-5736 if you have any questions on our comments.

Sincerely,



Steven R. Ritchie
Assistant General Manager, Water